

Message

From: Johnston, Jon [Johnston.Jon@epa.gov]
Sent: 7/19/2016 8:43:04 PM
To: Crosby-Vega, Terri [Crosby-Vega.Terri@epa.gov]
CC: Feely, Ken [Feely.Ken@epa.gov]
Subject: RE: Holston Army Ammunition Plant information request

Let me think about this and talk to you tomorrow. I may need to call their Pentagon office and our HQ before a RCRA info request. We'll talk.

Jon D. Johnston, Chief
Materials and Waste Management Branch
EPA Region 4
404-562-8527

From: Crosby-Vega, Terri
Sent: Tuesday, July 19, 2016 4:09 PM
To: Johnston, Jon <Johnston.Jon@epa.gov>
Subject: Holston Army Ammunition Plant information request

Hi Jon,
I have spoken with Alan Newman about issuing an information request letter to Holston in order to get a copy of the following document:

"Alternative Treatment Options for Open Burning of Explosive Waste at Holston Army Ammunition Plant, (ERDC/EL TR-12-8), March 2012."

I have requested the document through TDEC. Jimmy Ogle from HAAP told TDEC "it is a confidential document from Army" and refused to provide it to TDEC. I responded to TDEC in an email challenging HAAP's claim that the document is confidential.

Deliberative Process / Ex. 5

If there is confidential business information according to RCRA, HAAP can file it at the time of submittal.

Please let me know if you need further information or you would like to discuss the issues. EPA HQ is also trying to find this document.

Thanks!
Terri

Terri Crosby-Vega
Environmental Engineer
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Atlanta Federal Center 9T25
61 Forsyth Street SW
Atlanta, GA 30303
404-562-8497

From: Crosby-Vega, Terri
Sent: Wednesday, July 06, 2016 9:17 AM
To: 'John C. Webb' <John.C.Webb@tn.gov>; Albert.Frakes_tn.gov <Albert.Frakes@tn.gov>
Subject: FW: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Terri Crosby-Vega
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From: Crosby-Vega, Terri
Sent: Thursday, June 16, 2016 2:58 PM
To: 'Moe Baghernejad' <Moe.Baghernejad@tn.gov>; Land, Eva <Land.Eva@epa.gov>
Cc: Lippert, Kris <Lippert.Kristin@epa.gov>; Feely, Ken <Feely.Ken@epa.gov>; Gerhard, Sasha <Gerhard.Sasha@epa.gov>; Galbraith, Michael <Galbraith.Michael@epa.gov>; Shuster, Kenneth <Shuster.Kenneth@epa.gov>; Gaines, Jeff <Gaines.Jeff@epa.gov>; Abdul-Malik, Norma <Abdul-Malik.Norma@epa.gov>
Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

Hi Moe,

Thank you for your information. However, I would like to challenge the statement that "it is a confidential document from the Army."

In accordance with TDEC 1200-3-4-.04(1)(h) an exception to open burning may be approved where "there is no other practical, safe, and/or lawful method of disposal. Documentation demonstrating why the general open burning regulations cannot be met must be submitted." TDEC 1200-3-4-.04(1)(k) also states that "Open burning conducted under this exception is only allowed where no other safe means of disposal exists." Furthermore TDEC 1200-3-4-.04 (2) states "The Technical Secretary reserves the right to require a person to cease or limit open burning if emissions from the fires are deemed by the Technical Secretary or his designee to jeopardize public health or welfare, create a public nuisance or safety hazard, create a potential safety hazard, or interfere with the attainment or maintenance of the air quality standards."

With the TDEC Rules, the document of the Army should be in support of the exceptions allowed in the Rules. If the Army wants to assert "Confidential Business Information" status upon submittal, we can examine the information to see if the confidential standards apply. If you have other information associated with Holston in support of the exceptions in the Rules, please send me a copy of that information.

Holston is one of many facilities that the EPA is looking at because of open burning. The EPA's Explosive Alternatives Disposal Team's mission is to "Explore ways to better manage certain explosive wastes and reduce contamination from open burning and open detonation operations."

Thank-you in assisting me with this information!
Terri Crosby-Vega

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From: Moe Baghernejad [<mailto:Moe.Baghernejad@tn.gov>]
Sent: Monday, June 13, 2016 10:49 AM
To: Crosby-Vega, Terri <Crosby-Vega.Terri@epa.gov>; Land, Eva <Land.Eva@epa.gov>
Cc: Lippert, Kris <Lippert.Kristin@epa.gov>; Feely, Ken <Feely.Ken@epa.gov>
Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

I do not have it. I just spoke with Jimmy Ogle from HAAP. He said "it is confidential document from Army ". He will respond to me after he talk to them.

Thanks
Moe Baghernejad



Moe Baghernejad | TDEC- Environmental Protection Specialist
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615-532-0594
Moe.baghernejad@tn.gov
<http://www.tn.gov/environment/air.shtml>
Tell us how we're doing. [Take our TDEC customer service survey.](#)

From: Crosby-Vega, Terri [<mailto:Crosby-Vega.Terri@epa.gov>]
Sent: Monday, June 13, 2016 7:10 AM
To: Land, Eva; Moe Baghernejad
Cc: Lippert, Kris; Feely, Ken
Subject: RE: Title V Permit Renewal -Notification/ Holston Army Ammunition Plant

*** This is an EXTERNAL email. Please exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email - STS-Security. ***

I was wondering if you have a copy of the following document. Do you know if it was sent to EPA? I am looking for a copy of the document. Any information that you have would be helpful.

"Alternative Treatment Options for Open Burning of Explosive Waste at Holston Army Ammunition Plant, (ERDC/EL TR-12-8), March 2012."

Thanks!
Terri

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